

1 CHRIS T. RASMUSSEN, ESQ.
Nevada Bar No.:007149
2 RASMUSSEN LAW P.C.
520 S. 4th Street
3 Las Vegas, Nevada 89101
Tel: (702) 384-5563
4 Fax: (702) 550-7031
Attorney for Defendant
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6 UNITED STATES DISTRICT COURT
7 DISTRICT OF NEVADA

8 UNITED STATES OF AMERICA,
9 Plaintiff,
10
11 v.
12 TIMOTHY WILSON,
13 Defendant.
14

Case No. 2:20-cr-00129-JAD-EJY

STIPULATION AND ORDER TO
CONTINUE SENTENCING AND
DEADLINES

15 IT IS HEREBY STIPULATED AND AGREED, by and between Defendant,
16 TIMOTHY WILSON, by and through his counsel Chris T. Rasmussen, Esq., and the United
17 States of America, by and through Jason M. Frierson, United States Attorney, and Patrick Burns
18 and Regina Jeon, Trial Attorneys, Department of Justice, Tax Division, that the sentencing
19 hearing in this matter, currently scheduled for April 24, 2023, at 3:00 p.m., be continued to June
20 21, 2023, with objections to the presentence investigation report due on May 8, 2023, the
21 parties' sentencing memoranda due on June 9, 2023 and responses to sentencing memoranda
22 due on June 16, 2023.
23

24 This Stipulation is entered into for the following reasons:
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26

1 1. The parties agree to a continuance of the sentencing hearing currently
2 scheduled for April 24, 2023;

3 2. Counsel for Defendant needs additional time to adequately prepare for
4 sentencing;

5 3. Defendant is not in custody. Counsel for Defendant has spoken to the
6 Defendant and the Defendant has no objection to this continuance;

7 4. The parties understand that the Court may be able to accommodate their
8 request to continue the sentencing hearing to June 21, 2023. The parties also request that the
9 Court set the parties' deadline for filing objections to the presentence investigation report as
10 May 8, 2023, with sentencing memoranda due on June 9, 2023, and responses to sentencing
11 memoranda and objections due on June 16, 2023;

12 5. This request is made in good faith and not for purposes of delay. Denial of this
13 request could result in a miscarriage of justice;

14 6. For all the above-stated reasons, the ends of justice would best be served by a
15 continuance of the sentencing hearing and associated deadline;

16 7. This is the first request for a continuance of the sentencing in this matter.
17

18 DATED this 18th day of April, 2023.
19

20 */s/ Chris T. Rasmussen*

/s/ Patrick Burns

21 _____
22 CHRIS T. RASMUSSEN, ESQ.
23 Attorney for Defendant

24 PATRICK BURNS
25 REGINA JEON
26 Trial Attorneys
Department of Justice, Tax Division

CHRIS T. RASMUSSEN, ESQ.
Nevada Bar No. 007149
RASMUSSEN LAW P.C.
520 S. 4th Street
Las Vegas, Nevada 89101
T: (702) 384-5563
ctr@rasmussenlaw.com

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TIMOTHY WILSON,

Defendant.

Case No.: 2:20-cr-00129-JAD-EJY

**FINDINGS OF FACT,
CONCLUSIONS OF LAW, AND
ORDER**

FINDINGS OF FACT AND CONCLUSIONS OF LAW

Based on the stipulation of counsel, and good cause appearing, the Court finds that:

1. The parties agree to a continuance of the sentencing hearing currently scheduled for April 24, 2023;
2. Counsel for Defendant needs additional time to adequately prepare for sentencing;
3. Defendant is not in custody. Counsel for Defendant has spoken to the Defendant and the Defendant has no objection to this continuance;
4. The parties understand that the Court may be able to accommodate their request to continue the sentencing hearing to June 21, 2023. The parties also request that the Court set the parties' deadline for filing objections to the presentence investigation report as

1 May 8, 2023, with sentencing memoranda due on June 9, 2023, and responses to sentencing
2 memoranda and objections due on June 16, 2023;

3 5. This request is made in good faith and not for purposes of delay. Denial of this
4 request could result in a miscarriage of justice;

5 6. For all the above-stated reasons, the ends of justice would best be served by a
6 continuance of the sentencing hearing and associated deadlines;

7 7. This is the first request for a continuance of the sentencing in this matter.

8 **ORDER**

9 Accordingly, IT IS ORDERED that the sentencing currently scheduled for April 24,
10 2023 at the hour of 3:00 p.m., be vacated and continued to June 21, 2023, at the hour of
11 11:00 a.m.

12
13 IT IS FURTHER ORDERED that the parties' objections to the presentence
14 investigation report shall be due on May 8, 2023.

15 IT IS FURTHER ORDERED that the parties' sentencing memoranda shall be due on
16 June 9, 2023 and responses thereto due on June 16, 2023.

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18
19 DATED this 18th day of April, 2023.

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22 HON. JENNIFER A. DORSEY
23 UNITED STATES DISTRICT JUDGE
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